

NORMAN J. KENNARD
ADMITTED IN OHIO AND
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October 15, 2013

Via USPS Express Mail

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington D.C. 20554

Re: Connect America Fund, WC Docket No. 10-90; 2013 FCC Form 481

Dear Ms. Dortch:

In compliance with the Commission's rules at 47 CFR §§ 54.313(h)(2)(i) and 54.422(c), Glandorf Telephone Company, Inc. ("Glandorf") herewith submits a copy of its 2013 Form 481.

Glandorf requests that the financial results required in the section entitled "Rate of Return Carrier Additional Information". be accorded confidential treatment. Attached please find a statement of the reasons for withholding the redacted materials from public inspection pursuant to 47 CFR § 0.459.

Glandorf has e-filed, through ECFS, the redacted version and sent via USPS Express Mail the confidential version (original and one copy) of its 2013 FCC Form 481.

Thank you for your attention to this matter.

Sincerely,

THOMAS, LONG MESEN & KENNARD

By:

NJK:tlt

¹ The financial reports section of FCC Form 481 is identified at the Universal Service Administrative Company ("USAC") website as "Section 3005" in the downloadable version and as "Section 3000" in the online filing version at the same USAC website. http://www.usac.org/hc/tools/forms.aspx. The same identical financial information is required in both. The request for confidentiality applies regardless of whether the form submitted employs the 3005 or 3000 designation.

STATEMENT OF CONFIDENTIALITY REQUEST AND JUSTIFICATION OF GLANDORF TELEPHONE COMPANY, INC.

Glandorf Telephone Company, Inc. ("Glandorf" or "Company") is a small, privately held rural local exchange company based in Ohio. Glandorf requests confidential treatment of certain information being provided to the Commission in its 2013 FCC Form 481, because the information is competitively sensitive and its disclosure would have negative competitive consequences upon Glandorf were it made publicly available. Such information would not ordinarily be made available to the public and should be afforded confidential treatment under 47 CFR § 0.459.

Specifically, Glandorf requests that the documentation required in the section entitled "Rate of Return Carrier Additional Information, which consists of the Company's financial reports, income statement, balance sheet and cash flow statement, be accorded confidential treatment ("Confidential Information").

Degree to Which the Information in Question is Commercial or Financial, or Contains a Trade Secret or is Privileged

The Confidential Information is financial information, specifically the Company's income statement, balance sheet and cash flow statement. Financial Information is clearly deserving of confidential treatment.

The Confidential Information is also a trade secret under 5 U.S.C. § 552(b)(4). While there is no clear federal definition, the *Uniform Trade Secrets Act* defines trade secret as information that derives independent economic value, actual or potential, from not being generally known to or readily ascertainable through appropriate means by other persons who might obtain economic value from its disclosure or use and is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. http://www.uniformlaws.org/Default.aspx. The information for which confidential treatment is sought meets that definition.

Degree to Which the Information Concerns a Service that is Subject to Competition

Ohio has successfully opened its telecommunications markets to full competition. The services offered by the Company, including voice and broadband services, are subject to vigorous competition from completive local exchange carriers, cable operators, wireless carriers

¹ The financial reports section of FCC Form 481 is identified at the Universal Service Administrative Company ("USAC") website as "Section 3005" in the downloadable version and as "Section 3000" in the online filing version at the same USAC website. http://www.usac.org/hc/tools/forms.aspx. The same identical financial information is required in both. The request for confidentiality applies regardless of whether the form submitted employs the 3005 or 3000 designation.

and VoIP providers. Many of the Company's competitors are large, well-financed and national, even international, in scope.

Manner in Which Disclosure of the Information Could Result in Substantial Competitive Harm

The Confidential Information could be employed by both existing and potential competitors in a variety of ways, including: to determine the size of the market; the profitability of the market; and the financial resources of the Company. Clearly, were the Confidential Information made public, competitors could and would use this information to their competitive advantage. Moreover, disclosure would adversely affect Glandorf's ability to conduct business with other carriers.

Measures Taken to Prevent Unauthorized Disclosure

The Company has taken precautions to guard the secrecy of its financial results, including the Confidential Information, by limiting its dissemination. The Confidential Information is not known outside of Glandorf and is known within the Company only to senior managers and a limited number of employees with a particular need to know. Glandorf has expended a significant amount of time and money in developing the Confidential Information. The Confidential Information cannot be replicated by any other means.

<u>Availability of the Information to the Pubic and Extent of Any Previous Disclosure of the Information to Third Parties</u>

The Confidential Information is not available to the general public and has never been disclosed to any outside third parties, except as may be associated with financing, in which case confidentiality is required.

<u>Justification of the Period During Which the Material Should Not be Available for Public</u> Disclosure

Glandorf requests that the Confidential Information be maintained on a confidential basis indefinitely. Disclosure of the information at any time would be harmful.

Any Other Information That the Party Seeking Confidential Treatment Believes May Be Useful In Assessing Whether Its Request For Confidentiality Should Be Granted.

Exemption 4 of the Freedom of Information Act protects "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." 5 U.S.C. § 552(b)(4). The exemption affords protection to those submitters who are required to furnish

commercial or financial information to the government by safeguarding them from the competitive disadvantages that could result from disclosure. If the financial information relates to business or trade, courts have considered it "commercial or financial." See, e.g., Dow Jones Co. v. FERC, 219 F.R.D. 167, 176 (C.D. Cal. 2002) (information relating "to business decisions and practices regarding the sale of power, and the operation and maintenance" of generators (quoting agency declaration)); Merit Energy Co. v. United States Dep't of the Interior, 180 F. Supp. 2d 1184, 1188 (D. Colo. 2001) ("information regarding oil and gas leases, prices, quantities and reserves"), appeal dismissed, No. 01-1347 (10th Cir. Sept. 4, 2001). The Confidential Information satisfies this test as well.

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			FCCForm 481
			OMB 3060-0985
FCC For	n 481 - Carrier Annual Reporting		0180-0308 BMO
Data Co	llection Form	ALL	g/Burden Estimate per Respondent: 20 Hours
<010>	Study Area Code	300619	
<015>	Study Area Name	Glandorf Telephone	Company, Inc.
4010	Deady in Carronia		Jonipariy 1 2110.
<020>	Program Year	2014	
<030>	Contact Name: Person USAC should contact	Linda Heckman	
	with questions about this data		
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<035>	Contact Telephone Number: Number of the person identified in data line <030>	419-538-6987	
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<039>	Contact Email:	win vita (Ala nigoloba mat	
	Email of the person identified in data line <030>	glantel@bright.net	
Control Parties			54:318 54:422
			Completion Completion
ANNUA	L REPORTING FOR ALL CARRIERS		Required Required
			(check box when complete)
<100>	Service Quality Improvement Reporting	(complete attached worksheet)	X IIIIIIII
<200>	Outage Reporting (voice)	(complete attached worksheet)	XX
<210>	X < check box if no outage	es to report	
			mmmm
	Unfulfilled Service Requests (voice)	0	×
<310>	Detail on Attempts (voice)	(ottach descriptive document)	
	Unfulfilled Service Requests (broadband)	0	X
<330>	Detail on Attempts (broadband)	(attach descriptive document)	
<400>	Number of Complaints per 1,000 customers (voice)		XXX
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<420>	Mobile		
	Number of Complaints per 1,000 customers (broadband)		X IIIIIIIII
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<450>	Mobile		
			,
<500>	Service Quality Standards & Consumer Protection Rules Con	npliance (check to indicate certification)	XX
<510>		(attached descriptive document)	XXX
	Functionality in Emergency Situations	(check to indicate certification)	XXX
<610>	o official and the second	(attached descriptive document)	X X X
	Company Price Offerings (voice)	(complete attached worksheet) (complete attached worksheet)	
	Company Price Offerings (broadband) Operating Companies and Affiliates	(complete attached worksheet)	
	Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	×
	Voice Services Rate Comparability	(check to indicate certification)	
<1010>	voice dervices nace comparability	(attach descriptive document)	
	Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	× IIIIIIII
<1110>	, · · ·	(complete attached worksheet)	
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	
	Dring Con Corpions Dropped to Dring Co. Additional D.	entation Marksheet	
	Price Cap Carriers, Proceed to Price Cap Additional Docume		
<2000>	Including Rate-of-Return Carriers affiliated with Price Cap Lo	cal exchange carriers (check to indicate certification)	VIIIIIIIIII
<2000>		(complete attached worksheet)	
-2000		family and a state of the state	
	Rate of Return Carriers, Proceed to ROR Additional Docum	entation Worksheet	
<3000>		(check to indicate certification)	×
<3005>		(complete attached worksheet)	

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<010>	Study Area Code		300619			. i	
	Study Area Name			phone Company	v. Inc.		
<020>	Program Year		2014				
<030>	Contact Name - Person USAC should contact regarding this data		Linda Heckma	an			
<035>	Contact Telephone Number - Number of person identified in data line <030>		419-538-698	7	***************************************	<u> </u>	
<039>	Contact Email Address - Email Address of person identified in data line <030>		glantel@brig	ht.net		, n	
<110>	Has your company received its ETC certification from the FCC?	(yes / no)	Yes				
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no)	No			i	
	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.						
<112>	Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which receives only frozen support, your progress report is only required to address voice telephony service		of Observed Decou	2001/246			! .
	Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	Name	of Attached Docur	nent (.par)			
<113>	Maps detailing progress towards meeting plan targets						
<114>	Report how much universal service (USF) support was received				4		
<115>	How (USF) was used to improve service quality						***************************************
<115>	How (USF)was used to improve service quality						
<117>	How (USF) was used to improve service capacity						
<118>	Provide an explanation of network improvement targets not met In the prior calendar year.						
		,					



Glandorf Telephone Company, Inc.

Your Communications Link to the World

Documentation of the company's processes implemented to assure compliance with certification requirements pursuant to 47 CFR §54.313(a)(6) and §54.202(a)(2).

Glandorf Telephone Company, Inc. has an employee call-out procedure in place to mobilize its entire workforce in the event of an emergency situation. The notification process utilizes landline, cellular and internet technologies. In the event of total failure of all communications technologies, company practices include having employees report to the central office to obtain further instructions.

The central office and core network functionality is supported by 8 hours of battery reserve and a 45 KW generator fueled by Natural Gas which can run indefinitely. Network nodes containing active electronic equipment are equipped with battery backup. The company maintains a number of portable generator sets that can be deployed to network nodes in the event a power outage exceeds the battery reserve capacity.

The facility network is designed as a diverse-routed fiber optic ring, capable of instantaneously switching traffic around damaged facilities. Employees are trained in fiber optic splicing and the necessary equipment is maintained on-site for rapid deployment and restoration. Separate facilities support the PSTN and broadband network connections to other carriers. In the event that all PSTN facilities are damaged, the switch is capable of both TDM and IP formats, providing the ability to reroute PSTN traffic via dedicated IP facilities to other carriers.

The network is capable of managing traffic spikes caused by emergency situations. This is accomplished by maintaining properly sized trunk groups to the PSTN and by providing substantial broadband backbone bandwidth capable of carrying overflow voice traffic in addition to data traffic.

135 S. Main St. – P.O. Box 31 – Glandorf, Ohio 45848 Phone: 419-538-6987 – Fax: 419-538-6668

> Mobile: 419-796-0136 E-mail: glantel@bright.net

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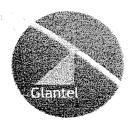
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<039>	Contact Email Address - E	mail Addr	ess of person identified in	data line <030>				glantel@bright.	net		ļ	
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<015>	Study Area Name		Glandorf Telephone Compa	ny Inc.			
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<030>	Contact Name - Person USAC should contact regarding this data		Linda Heckman				
<035>	Contact Telephone Number - Number of person identified in data line		419-538-6987				
<039>	Contact Email Address - Email Address of person identified in data line	e <030>	glantel@bright.net				
<910>	Tribal Land(s) on which ETC Serves		NO				
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<920>	Tribal Government Engagement Obligation		the way was a second and the second				
			Name of Attached Docume	nt (.pdf)			
	If your company serves Tribal lands, please select (Yes, No, NA) for					1	
	each these boxes to confirm the status described on the attached					-	4 : E
	PDF, on line 920, demonstrates coordination with the Tribal						
	government pursuant to § 54.313(a)(9) includes:						
		Select			and the second	4	
		(Yes,No,			i		
		NA)					
<921>	Needs assessment and deployment planning with a focus on Tribal						
	community anchor institutions;						
<922>	Feasibility and sustainability planning;	7777777					
<923>	Marketing services in a culturally sensitive manner;		The state of the s				
<924>	Compliance with Rights of way processes		- Cara managambana ayanta a				garage seems
<925>	Compliance with Land Use permitting requirements						
<926>	Compliance with Facilities Siting rules						
<927>	Compliance with Environmental Review processes						
<928>	Compliance with Cultural Preservation review processes		The State of the Common Medical Common State of the Common State o	<u> </u>			
<929>	Compliance with Tribal Business and Licensing requirements.						
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<015>	Study Area Name		Glandorf Tel	ephone Com	pany Inc.			
<020>	Program Year		2014					
<030>	Contact Name - Person USAC should contact regarding this data		Linda Heckm	ian				
<035>	Contact Telephone Number - Number of person identified in data lir	ne <030>	419-538-698	7				
<039>	Contact Email Address - Email Address of person identified in data li	ne <030>	glantel@brig	tht.net				
	Please check this box to confirm no terrestrial backhaul	X						
<1120>	options exist within the supported area pursuant to § 54.313(G)							
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<1130>	broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)							
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Lifelinė	ms and Condition for Lifeline Customers ction Form				FCC Form 481 OMB Control No. 3060 OMB Control No. 3060 July 2013	-0819
<010>	Study Area Code			300619		L
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	Program Year			2014		
	Contact Name - Person USAC should contact regarding this data			Linda Heckman		
<035>	Contact Telephone Number - Number of person identified in data line			419-538-6987		
<03.9>	Contact Email Address - Email Address of person identified in data lin	e <030>		glantel@bright.net		
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	Lifeline Terms & Conditions				
* *** *** ****************************		Name of attached docun	nent (.pdf)			
<1220>	Link to Public Website	HTTP www.glantel.net				
	Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:		2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	X				10 m
<1222>	Details on the number of minutes provided as part of the plan,	X		S.2		
<1223>	Additional charges for toll calls, and rates for each such plan.	X				
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Glandorf Telephone Company, Inc.

Your Communications Link to the World

Documentation of the company's compliance with certification requirements pursuant to 47 CFR §54.313(a)(5).

In addition to the rules and regulations contained in Title 47, Code of Federal Regulations, Glandorf Telephone Company, Inc. is subject to the following Service Quality Standards and Consumer Protection Rules of the Public Utilities Commission of Ohio:

Ohio Administrative Code

4901:1-6-09 4901:1-6-12	Eligible Telecommunication Carrier certification (high cost and Lifeline). Service Requirements for BLES (Basic Local Exchange Service), including installation and repair intervals, deposits, payments and disconnection.
4901:1-6-13	Warm line service.
4901:1-6-14	BLES pricing parameters, including late payment charges and
	reconnection fees.
4901:1-6-15	Directory Information.
4901:1-6-16	Unfair or deceptive acts and practices.
4901:1-6-17	Truth in billing requirements.
4901:1-6-18	Slamming and preferred carrier freezes.
4901:1-6-19	Lifeline requirements.
4901:1-6-20	Discounts for persons with communications disabilities.
4901:1-6-27	Provider of last resort (POLR).
4901:1-6-30	Company records and complaint procedures.
4901:1-6-31	Emergency and outage operations.
4901:1-7-03	Toll presubscription.
4901:1-7-24	Local number portability (LNP).
4901:1-7-26	Competition safeguards (CPNI).

Ohio Revised Code

Unfair or deceptive trade practices.
Basic local exchange service standards.
Access to 9-1-1 service.
Access to basic local exchange service.
Alteration of rates for basic local exchange service.
Lifeline service for eligible residential customers.
Adoption of rules for rates for persons with disabilities.
Rates, terms and conditions for 9-1-1 and other services.

The company has established policies and procedures designed to protect consumers, including publishing customer rights, formal complaint procedures, and policies related to privacy, slamming and network management. These can be viewed on the company's web site at www.glantel.net.

The company observes strict compliance to all CPNI rules, including training for new employees, refresher training for current employees, maintaining written practices for handling CPNI and submitting annual certifications to regulatory agencies. The CPNI manual is available for inspection at the company business office. The company uses a contracted service order administrator to process LNP requests within the time constraints contained in the rules. Customer billing is performed by a billing vendor that maintains software that complies with all truth in billing requirements, including the information that is required to be displayed on the customer bill. The company maintains a CALEA manual and utilizes a third party vendor to make sure that all CALEA requests are processed in accordance with applicable laws and regulations. The CALEA manual and procedures are filed with the appropriate agencies and are also maintained at the company business office.

The company's Basic Local Exchange Service Tariff, PUCO No. 6, contains BLES pricing, 9-1-1, Lifeline and IntraLATA presubscription information, terms and conditions. The tariff is available at the company business office and in the tariff section of the PUCO website http://www.puco.ohio.gov.

Other sections of FCC Form 481 contain additional information regarding the following: Lifeline terms and conditions - Line 1210 Emergency operations - Line 610

> 135 S. Main St. – P.O. Box 31 – Glandorf, Ohio 45848 Phone: 419-538-6987 – Fax: 419-538-6668

> > Mobile: 419-796-0136 E-mail: glantel@bright.net



Glandorf Telephone Company, Inc.

Your Communications Link to the World

Glandorf Telephone Company, Inc. (SAC 300619) has established terms and conditions for Lifeline customers that incorporate the Federal and State requirements as documented in its Basic Local Exchange Service Tariff PUCO No. 6, Section 5, First Revised Sheet No. 1.

The Company shall provide Lifeline service as defined in 47 C.F.R. § 54.401 (a) on a non-discriminatory basis to all qualifying low-income customers. The Company's Lifeline service offering shall comply with all applicable Federal and State Laws, including, but not limited to, 47 C.F.R. Part 54, Subpart E; the FCC's Lifeline reform order (Report and Order released February 6, 2012, WC Docket No, 11-42, et. al) and any subsequent clarifying orders; Section 4927.13, Revised Code; Rule 4901:1-6-19, Ohio Administrative Code; and, the Commission's nontraditional Lifeline service order (Finding and Order adopted May 23, 2012, Case No. 10-2377-TP-COI) and any subsequent entries and/or orders.

The Company's website has a page dedicated to Lifeline support that explains its availability to customer, maximum discount amount, qualification requirements, annual renewal requirements, household limitations and penalties for false statements made to obtain the benefit. The page can be viewed at http://glantel.net/ila.htm.

The Lifeline discount applies to Basic Local Exchange Service (BLES) as defined by Ohio Revised Code 4927.01(A)(1). For residence customers, BLES consists of local dial tone service, flat-rate telephone exchange service, touch-tone dialing service, access to and usage of 9-1-1 services, provision of a telephone directory at no charge, listing in that directory, per call caller identification blocking services, access to telecommunications relay service and access to toll presubscription, interexchange or toll providers or both, and networks of other telephone

companies. The company also provides an optional toll denial feature at no additional charge.

Residential BLES customers may also add optional service features and subscribe to a variety of long distance calling plans offered by the Company. These optional services are described on the company website (http://glantel.net) under the Services and Bright Long Distance links.

The company applies the Lifeline support amount as follows: first, to waive the End User Common Line Charge and second, to discount the residential BLES charges with the remaining balance of the support amount, in compliance with 47 C.F.R. §54.403(b).

135 S. Main St. – P.O. Box 31 – Glandorf, Ohio 45848

Phone: 419-538-6987 - Fax: 419-538-6668 Mobile: 419-796-0136

E-mail: glante l@bright.net

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Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No.: 3060-0986 OMB Control No.: 3060-0819 July-2013
	Annual of States (1997), 1997,
<010> Study Area Code	300619
<015> Study Area Name	Glandorf Telephor
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Linda Heckman
<035> Contact Telephone Number - Number of person identified in data line <03	
<039> Contact Email Address - Email Address of person identified in data line <03	30> glantgl@brlght.ne
TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CA	RRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:
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recipients; and, to the best of my knowledge, the information reported on this form	and in any attachments is accurate.
Name of Reporting Carrier: Glandorf Felephone Company, Inc. //	
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Signature of Authorized Officer: Journa Neckman) Date $10-13$
Printed name of Authorized Officer: Linda Heckman	
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Title or position of Authorized Officer: Asst. Treasurer	
7 1 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	
Telephone number of Authorized Officer: 419-538-6987	
Study Area Code of Reporting Carrier: 300619	Filing Due Date for this form: 10/15/2013
Persons willfully making false statements on this form can be nunished by fine or forfe	efture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment
	ited States Code, 18 U.S.C. § 1001.